

FILED

JUN 28 2017

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

U.S. DISTRICT COURT-WVND
CLARKSBURG, WV 26301

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANNE LOUISE HALL,

Defendant.

Criminal No.

1:17 cr 35

Violations:

18 USC § 641

18 USC § 1001(a)(2)

42 USC § 1383a(a)(2)

42 USC § 1383a(a)(3)

INDICTMENT

The Grand Jury charges that:

COUNT ONE

(False Statement for Use in Determining Supplemental Security Income Benefits)

On or about November 21, 2016, in Pleasants County, in the Northern District of West Virginia, defendant **ANNE LOUISE HALL** in a matter within the jurisdiction of the Social Security Administration ("SSA"), did knowingly and willfully make and caused to be made a false statement and representation of a material fact for use in determining rights to Supplemental Security Income ("SSI") benefits. Specifically, on a Statement of Claimant or Other Person dated November 21, 2016, defendant **ANNE LOUISE HALL** stated that from about 2005 to present, she had been separated from her husband, D.H. ,and had lived alone at an address in Saint Mary's, West Virginia 26170. In truth and fact, as the defendant well knew she was not separated from her husband, D.H., because she also lived at that residence from about 2005 to present; in violation of Title 42, United States Code, Section 1383a(a)(2).

COUNT TWO

(Concealment of Event Affecting Right to Receive Supplemental Security Income Benefits)

On or about December 1, 2016, in Pleasants County, in the Northern District of West Virginia, defendant **ANNE LOUISE HALL**, having knowledge of the occurrence of an event affecting the continued right to receive payment of the Title XVI Supplemental Security Income (“SSI”), did conceal and fail to disclose such event with the intent to fraudulently secure such benefit in a greater amount or quantity than is due and when no such benefit is authorized. Specifically, on a Statement of Claimant or Other Person dated November 21, 2016, defendant **ANNE LOUISE HALL** concealed and failed to disclose the income and assets of her husband, D.H., who had been living with the defendant from at least 2005 to present; in violation of Title 42, United States Code, Section 1383a(a)(3).

COUNT THREE

(False Statement to Federal Agent)

On or about November 21, 2016, in Pleasants County, in the Northern District of West Virginia, in a matter within the jurisdiction of the executive branch of the Government of the United States, defendant **ANNE LOUISE HALL** did knowingly and willfully make a materially false, fictitious, fraudulent statement and representation, that is the defendant told a Social Security Administration (“SSA”) Claims Specialist that she and her husband, D.H., had been separated since 2005, and she did not receive any financial support from D.H. when the defendant then and there knew that she and her husband, D.H., had lived together since at least 2005, and she had received financial support from D.H. during that timeframe; in violation of Title 18, United States Code, Section 1001(a)(2).

COUNT FOUR

(Theft of Government Money)

On or about October 1, 2006, through March 1, 2017, in Pleasants County, in the Northern District of West Virginia, defendant **ANNE LOUISE HALL** did willfully and knowingly steal, purloin, and convert to her own use a thing of value of the United States, that is, Supplemental Security Income (“SSI”) benefits for herself exceeding \$1,000.00 in value; in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATION

Theft of Public Money, Property, or Records

Pursuant to Title 28, United States Code, Section 2461(c), Title 18, United States Code, Sections 981(a)(1)(C) and 1956(c)(7), and Title 21, United States Code, Section 853, the government will seek the forfeiture of property as part of the sentence imposed in this case; that is, the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641, or a conspiracy to violate such offense, including a money judgment in the amount of \$54,678.90.

A true bill,

/s/
Grand Jury Foreperson

/s/
BETSY STEINFELD JIVIDEN
Acting United States Attorney

Shawn M. Adkins
Assistant United States Attorney